

August 7, 1985

Dear Manufacturer:

CD-85-12 (LD/HD/MC)

Subject: Office Security/Implementation of Central Mail System

The Certification Division (CD) processes a significant amount of information that is considered confidential or sensitive by manufacturers. It is our responsibility to provide reasonable assurance of the security of this information. The CD has an existing security policy (Ref.: CD Operating Principles and Policies dated August 14, 1978), however, informal relaxation of the original written policy has led to the current deterioration of its practice. We are, therefore, reimplementing tight control to better assure confidentiality of manufacturers' data. In this reissuance, we are incorporating more flexibility in the policy to facilitate practical implementation and avoid future informal relaxation of this security policy.

Contrary to the existing security policy, manufacturer representatives have been allowed relatively free access to the CD office wing (the 200 wing). This situation evolved because our resources have become too limited to escort representatives during their frequent visits. The lack of a central mail pickup point for manufacturers made it necessary for representatives to enter certification team offices to pick up mail. Such frequent and unannounced entry into the offices has caused some disruption in employee functions (including team conferences about manufacturer issues) and represents a potential security breach. As a solution to this, as described below, we have established a central mail pickup and delivery point. This will eliminate the necessity for representatives to make frequent visits into the CD wing, and will be much more convenient for representatives to pickup and deliver mail.

Effective immediately, non-EPA personnel will not be permitted to enter Certification offices or the hallway beyond the rest rooms in the "200 wing" without specific permission. While we may grant general exemptions for certain contractor or other government agency personnel, manufacturer representatives will be allowed to enter the Certification office area only after notifying the person he or she wishes to see and after obtaining specific permission to enter for that visit. At the discretion

of the Certification staff member, the manufacturer representative will either be authorized to proceed unescorted directly to that specific Certification office or the Certification member will meet the representative in the lobby. A telephone is provided in the lobby enabling you to contact Certification personnel for certification meetings. Mailboxes are now provided in Room 101 for manufacturers that routinely are onsite to pick up or deliver mail. (A list of those manufacturers with assigned boxes is enclosed.) Unfortunately the number of available pickup boxes is limited. Those manufacturers that are not assigned a mailbox must contact their team representative and go to their office to pick up or deliver mail. (Note these manufacturers should still use the INCOMING mail drop in Room 101.)

The assigned outgoing mailboxes are opened via key locks. The keys for these mailboxes must not be taken from the building. The security guard or operator in the lobby will keep a key box, and will dispense the keys to the manufacturer representative upon proper identification.* The keys must be returned to the lobby desk before leaving the premises.

The large box labeled INCOMING is for all manufacturers to use when personally delivering mail. We will empty this box at least twice a day. If the slot provided on this box is too small for some submissions, or if the box appears to be full, call the appropriate team office to arrange delivery. Similarly, if outgoing mail does not fit in the outgoing box, a team member will contact the manufacturer representative to arrange a pickup.

I regret the need to more rigidly restrict access to the certification offices but our primary concern is the security of manufacturers' sensitive information. This restricted access will be more inconvenient for both the manufacturers' representatives and the Certification Division staff. Hopefully, the mailbox procedures we are establishing will minimize the inconvenience to manufacturers. We are open to suggestions for improvements to the system. Any such suggestions may be directed to either Judy Carmickle of my immediate staff or to your Certification team representative.

Sincerely yours,

Robert E. Maxwell, Director
Certification Division
Office of Mobile Sources

Enclosure

* The recently issued ID's for the data pickup window are ideal for this purpose. However, a company ID with a picture would be acceptable.

Enclosure

Specific mailboxes are assigned to the following manufacturers

American Motors
Chrysler
Ford
Fuji
General Motors
Isuzu
Mazda
Mitsubishi
Nissan
Olson
Toyota
Volkswagen

A file-only page is stored as CD8512.PCX